

EXHIBIT F

Michaela Wey

Page 1

UNITED STATES DISTRICT COURT

DISTRICT OF NEW YORK

CASE NO. 14-CV-5474 (PGG)

- - -

HANNA BOUVENG, :

Plaintiff, :

vs. :

NYG CAPITAL LLC d/b/a/ :

NEW YORK GLOBAL GROUP :

GROUP, FNL MEDIA LLC, :

and BENJAMIN WEY, :

Defendants. :

VIDEOTAPED DEPOSITION OF

MICHAELA WEY

March 12, 2015

New York, New York

- - -

REPORTED BY: DANA N. SREBRENICK, CRR CLR

- - -

GOLKOW TECHNOLOGIES, INC.

877.370.3377 ph/917.591.5672 fax

deps@golkow.com

Michaela Wey

Page 22	Page 24
<p>1 A. I am not aware of how FNL and</p> <p>2 where FNL receives any income.</p> <p>3 Q. And do you receive any income</p> <p>4 from FNL Media?</p> <p>5 A. I do not receive any income</p> <p>6 from --</p> <p>7 Q. Do you receive -- do you</p> <p>8 receive income from any source?</p> <p>9 A. Yes.</p> <p>10 Q. Who do you receive income from?</p> <p>11 A. It's an investment income.</p> <p>12 Q. Personal investment --</p> <p>13 A. Yes.</p> <p>14 Q. -- income?</p> <p>15 The apartment that you live in,</p> <p>16 is that a condominium?</p> <p>17 A. Yes.</p> <p>18 Q. Do you own the condominium?</p> <p>19 MR. SHER: Objection.</p> <p>20 Relevance.</p> <p>21 What does this have to do with</p> <p>22 the claims and defenses?</p> <p>23 MR. RATNER: Do -- do you --</p> <p>24 are you -- are you prohibiting her from</p> <p>25 answering that question?</p>	<p>1 BY MR. RATNER:</p> <p>2 Q. Are there common charges on the</p> <p>3 apartment?</p> <p>4 A. Yes.</p> <p>5 Q. Who pays the common charges?</p> <p>6 A. I do.</p> <p>7 Q. Do you have --</p> <p>8 (Whereupon, a brief discussion</p> <p>9 is held off the record.)</p> <p>10 MR. SHER: She's willing to</p> <p>11 answer the earlier question. Mrs. Wey is</p> <p>12 willing to answer your earlier question about</p> <p>13 the apartment.</p> <p>14 BY MR. RATNER:</p> <p>15 Q. Who owns the apartment?</p> <p>16 A. I partially own it.</p> <p>17 Q. Who -- who else owns it?</p> <p>18 A. A trust owns it.</p> <p>19 Q. What's the name of the trust?</p> <p>20 A. I don't believe this is</p> <p>21 relevant.</p> <p>22 MR. SHER: Okay. I think -- I</p> <p>23 think the name of the trust is beyond the</p> <p>24 scope.</p> <p>25 MR. RATNER: Okay.</p>
Page 23	Page 25
<p>1 MR. SHER: Well, I think until</p> <p>2 I'm persuaded this is not judgment discovery,</p> <p>3 I'm -- I'm open to hearing how it's relevant</p> <p>4 to the claims and defenses.</p> <p>5 MR. RATNER: I -- I think it's</p> <p>6 both background information and could --</p> <p>7 could go to her bias in the case, which I</p> <p>8 think we're entitled to develop, such as --</p> <p>9 same with her sources of income. Stuff like</p> <p>10 that.</p> <p>11 MR. SHER: How does it go to her</p> <p>12 bias?</p> <p>13 MR. RATNER: If -- if someone</p> <p>14 else owns it and is paying for it and -- and</p> <p>15 that's where she's living, it could affect</p> <p>16 her bias in the case.</p> <p>17 MR. SHER: So the question is</p> <p>18 does she own the -- the apartment?</p> <p>19 MR. RATNER: Uh-huh.</p> <p>20 MR. SHER: Do you mind if I</p> <p>21 confer with my client?</p> <p>22 MR. RATNER: Absolutely not.</p> <p>23 MR. SHER: Okay, I'm going to</p> <p>24 direct her not to answer that.</p> <p>25 MR. RATNER: Okay.</p>	<p>1 BY MR. RATNER:</p> <p>2 Q. Do you have any financial</p> <p>3 interest in New York Global Group?</p> <p>4 A. No.</p> <p>5 Q. Do you have any -- have you</p> <p>6 ever heard of New York Global Group Asia?</p> <p>7 A. Yes.</p> <p>8 Q. Do you have any financial</p> <p>9 interest in New York Global Group Asia?</p> <p>10 A. No.</p> <p>11 Q. Do you know what, if anything,</p> <p>12 is the connection between New York Global</p> <p>13 Group in New York and New York Global Group</p> <p>14 Asia?</p> <p>15 A. I believe they -- they are</p> <p>16 co- -- co-brand entities.</p> <p>17 Q. What's a co-brand entity?</p> <p>18 A. Entity that uses the same brand</p> <p>19 name.</p> <p>20 Q. Does New York Global Group</p> <p>21 New York receive any income from New York</p> <p>22 Global Group Asia?</p> <p>23 A. Yes.</p> <p>24 Q. How much, on an annual basis or</p> <p>25 any other basis that you know?</p>

7 (Pages 22 to 25)

Michaela Wey

Page 26	Page 28
<p>1 A. I am not aware. I would have 2 to look at -- go back to the records. 3 Q. Okay. And would -- would the 4 income of New York Global Group New York from 5 New York Global Group Asia be part of the 6 records and books of New York Global Group 7 that you're familiar with? 8 A. Yes. 9 Q. Okay. Does New York Global 10 Group New York receive income from any other 11 source other than New York Global Group Asia? 12 A. Yes. 13 Q. What other sources? 14 A. From other consulting -- from 15 other companies, for consulting projects. 16 Q. Are any of those companies 17 located in the United States? 18 A. I believe so. 19 Q. Do you know the names of any of 20 those companies? 21 A. I would have to go back to the 22 records. 23 Q. Okay. Does New York Global 24 Group in New York also receive income from 25 businesses or entities in China?</p>	<p>1 A. This -- 2 MR. SHER: Yeah, this is -- 3 A. This is beyond the scope. 4 MR. SHER: This is not relevant 5 to this case. 6 MR. RATNER: Huh? 7 MR. SHER: Her personal -- 8 personal financial interests are not relevant 9 to this case. 10 I'm -- I'm directing her not to 11 answer. 12 BY MR. RATNER: 13 Q. Does your husband have any 14 financial interest in FIKA, FIKA? 15 MR. SHER: Same -- same 16 objection. 17 I'm directing her not to 18 answer. 19 BY MR. RATNER: 20 Q. What, if anything, did you do 21 to prepare for today's deposition? 22 A. I reviewed the complaint. 23 Q. Anything else? 24 A. I reviewed the transcript from 25 December hearing.</p>
Page 27	Page 29
<p>1 A. I would have to go back and 2 look. 3 Q. And how about from business or 4 entities in -- in Europe? 5 A. Again, I would have to go back 6 and look. 7 Q. And do you know what FIKA is, 8 F-I-K-A? 9 A. Yes. 10 Q. What's FIKA? What is -- 11 A. FIKA? 12 Q. F-I-K-A. 13 A. It's called FIKA. 14 Q. FIKA. FIKA, FIKA. You say 15 FIKA, I say FIKA. 16 A. FIKA is a coffee chain -- 17 coffee chain company. 18 Q. Is it a coffee chain company 19 here in the United States? 20 A. Yes. 21 Q. Do you have any ownership 22 interest in FIKA? 23 MR. SHER: Objection. 24 BY MR. RATNER: 25 Q. You can answer.</p>	<p>1 Q. Anything else? 2 A. No. 3 Q. Did you meet with Mr. Sher? 4 A. No. 5 Q. Did you meet with any lawyer? 6 A. Yes. 7 Q. Who? 8 A. I met with Mr. -- with our 9 attorney -- in-house lawyer. 10 Q. Mr. Baxter? 11 A. No, with Mr. Warren Raiti. 12 Q. Who? 13 A. With Mr. Raiti. 14 Q. How long did you meet with him? 15 A. For about three hours. 16 Q. When was that? 17 A. Yesterday. 18 Q. Did you review your husband's 19 deposition transcript? 20 A. No. 21 Q. Did you review Mr. Baxter's 22 deposition transcript? 23 A. No. 24 Q. Did you talk to Mr. Baxter at 25 all about his deposition?</p>

8 (Pages 26 to 29)

Michaela Wey

Page 62	Page 64
<p>1 Q. You and he own a house in the</p> <p>2 Hamptons?</p> <p>3 A. We have a house in the</p> <p>4 Hamptons.</p> <p>5 Q. Do you own it or rent it?</p> <p>6 A. We own it.</p> <p>7 Q. And is it in your name, his</p> <p>8 name, both?</p> <p>9 MR. SHER: Objection. We're --</p> <p>10 BY MR. RATNER:</p> <p>11 Q. Or neither?</p> <p>12 MR. SHER: -- beyond the scope</p> <p>13 of this deposition.</p> <p>14 (Whereupon, a brief discussion</p> <p>15 is held off the record.)</p> <p>16 MR. RATNER: I'll move on.</p> <p>17 BY MR. RATNER:</p> <p>18 Q. During the summer of 2013, did</p> <p>19 you and your husband go to the house in the</p> <p>20 Hamptons together?</p> <p>21 A. I don't remember what exactly</p> <p>22 we did in the summer of two-thousand four- --</p> <p>23 '13, but normal -- under normal</p> <p>24 circumstances, we would go to the house</p> <p>25 together in the summer, yes.</p>	<p>1 Q. When he went to Sweden, when</p> <p>2 was that?</p> <p>3 MR. SHER: Objection to form.</p> <p>4 BY MR. RATNER:</p> <p>5 Q. To check out Ms. Bouveng's</p> <p>6 story?</p> <p>7 A. I don't know. It must have</p> <p>8 been before he hired her.</p> <p>9 Q. When did he hire her? When did</p> <p>10 she start working at New York Global Group?</p> <p>11 A. I believe she started working</p> <p>12 in October 2013.</p> <p>13 Q. Now, during -- during -- from</p> <p>14 October 2013 through April 2014, how often</p> <p>15 would you be out of town?</p> <p>16 A. I'm not able to answer this</p> <p>17 question. I don't -- I don't remember.</p> <p>18 Q. Do you -- do you go out of town</p> <p>19 regularly?</p> <p>20 A. I did not go out of town</p> <p>21 regularly.</p> <p>22 Q. Once a month?</p> <p>23 A. What does it mean to go out of</p> <p>24 town?</p> <p>25 Q. To sleep someplace other than</p>
Page 63	Page 65
<p>1 Q. During the summer of 2013, did</p> <p>2 you ever go to the house in the Hamptons</p> <p>3 without your husband?</p> <p>4 A. I don't know whether it</p> <p>5 happened during the summer of 2013, but at</p> <p>6 certain occasions, I do go to the house in</p> <p>7 the Hamptons without my husband.</p> <p>8 Q. And during the summer of 2013,</p> <p>9 did your husband go to the house in the</p> <p>10 Hamptons without you?</p> <p>11 A. I don't know.</p> <p>12 Q. Before -- do I -- do I</p> <p>13 understand your testimony that, before hiring</p> <p>14 Ms. Bouveng, Mr. Wey traveled to Sweden in</p> <p>15 order to see if she was telling him the truth</p> <p>16 about her family connections?</p> <p>17 Is that your --</p> <p>18 A. That is my understanding, yes.</p> <p>19 Q. Okay. That's what he told you?</p> <p>20 A. He didn't say it in this</p> <p>21 specific way.</p> <p>22 Q. Well, what exactly did he tell</p> <p>23 you?</p> <p>24 A. I don't remember what exactly</p> <p>25 he told me.</p>	<p>1 your New York City apartment.</p> <p>2 A. Probably -- yes, possibly once</p> <p>3 a month.</p> <p>4 Q. Where would you go?</p> <p>5 A. I would go to China.</p> <p>6 Q. Why would you go to China?</p> <p>7 A. Because I have a family there.</p> <p>8 Q. And you'd bring your kids to</p> <p>9 China?</p> <p>10 A. No.</p> <p>11 Q. When you went to China, would</p> <p>12 your husband go with you?</p> <p>13 A. No.</p> <p>14 Q. Do you and he have an open</p> <p>15 marriage?</p> <p>16 A. What is an open marriage?</p> <p>17 Q. That you date other people.</p> <p>18 A. I don't think that is an --</p> <p>19 this is an appropriate question.</p> <p>20 Q. Oh, yes, it is, and Mr. Sher</p> <p>21 didn't object.</p> <p>22 Do you and your husband have an</p> <p>23 open marriage?</p> <p>24 A. Absolutely not.</p> <p>25 Q. How long -- when you'd take</p>

17 (Pages 62 to 65)

Michaela Wey

Page 66	Page 68
<p>1 these trips to China, how long would they be 2 for?</p> <p>3 MR. SHER: Objection to form.</p> <p>4 A. Ten days at a time.</p> <p>5 BY MR. RATNER:</p> <p>6 Q. Who'd stay with your children?</p> <p>7 A. My husband and my nanny.</p> <p>8 Q. Now, you -- you said -- when 9 you went to China, did -- did you meet with 10 people from New York -- NYGG Asia?</p> <p>11 A. No.</p> <p>12 Q. Do you have any personal 13 businesses in China?</p> <p>14 A. Yes.</p> <p>15 Q. Were any of those businesses 16 associated with NYGG?</p> <p>17 A. No, excuse me. Personal 18 business, meaning -- no, I don't have any 19 business, corporate business. My son goes to 20 school in China. This is why I go to China.</p> <p>21 Q. Okay. You said you went to 22 Luxembourg because Mr. Wey asked you for some 23 help on a project?</p> <p>24 A. Correct.</p> <p>25 Q. Has he asked you for help on</p>	<p>1 Q. What did he tell you he did 2 there?</p> <p>3 A. He didn't tell me anything 4 about what he did there.</p> <p>5 Q. When did you find out that 6 Ms. Bouveng got fired?</p> <p>7 A. On the day she got fired.</p> <p>8 Q. Did you know he was -- Mr. Wey 9 was going to fire her before he fired her?</p> <p>10 A. No.</p> <p>11 Q. How did you find out he fired 12 her?</p> <p>13 A. He called me.</p> <p>14 Q. That was on April 22, 2014?</p> <p>15 A. If this is the day she got 16 fired, then that would be the day.</p> <p>17 Q. Okay. What time of day did he 18 call you?</p> <p>19 A. I don't remember.</p> <p>20 Q. Was it morning, middle of the 21 day, afternoon, evening?</p> <p>22 A. I don't know.</p> <p>23 Q. Where were you when he called 24 you?</p> <p>25 A. I don't know.</p>
Page 67	Page 69
<p>1 projects before that?</p> <p>2 A. He has asked me for some help 3 on projects before, yes.</p> <p>4 Q. What kind of projects?</p> <p>5 A. Same nature, investments. 6 He -- yeah, investment projects.</p> <p>7 Q. About how often would you help 8 him on these investment projects?</p> <p>9 A. Maybe once a year.</p> <p>10 Q. Are -- are you aware if your 11 husband paid -- helped anyone else with the 12 rent -- with rent besides Ms. Bouveng?</p> <p>13 A. I'm not aware of that.</p> <p>14 Q. Do you know a woman by the name 15 of Chemme Koluman?</p> <p>16 A. No.</p> <p>17 Q. Are you aware that from time to 18 time your husband visited Ms. Bouveng at the 19 apartment on Broad Street?</p> <p>20 A. I am not -- I don't know. I 21 don't know.</p> <p>22 Q. Did he ever tell you he went to 23 that Broad Street apartment?</p> <p>24 A. Yeah, he said he was there, 25 yes.</p>	<p>1 Q. Where was he when he called 2 you?</p> <p>3 A. I don't know where he was.</p> <p>4 Q. Did he call you on a cell phone 5 or on a landline?</p> <p>6 A. I don't remember.</p> <p>7 Q. Were you in your apartment?</p> <p>8 A. I don't remember.</p> <p>9 Q. What did he say to you when he 10 called you, as best as you can, verbatim?</p> <p>11 A. He said he had to terminate 12 Hanna. He was very upset. He said that she 13 lied to him and that she was too much risk 14 for him and his company and he couldn't 15 tolerate it anymore.</p> <p>16 Q. Did he tell you what she lied 17 to him about?</p> <p>18 A. He -- she lied to him whether 19 she went out last night and stayed late, and 20 she also lied to him about whether there was 21 somebody else staying in the apartment at the 22 time.</p> <p>23 Q. Did he tell you why she was too 24 much of a risk to the company?</p> <p>25 A. We had discussed it over time</p>

18 (Pages 66 to 69)